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Attorneys for ANVIL POWER, INC., ANVIL  
 EQUIPMENT COMPANY LP, ANVIL  
 BUILDERS, ANVIL HOLDINGS, INC., ANVIL  
 GROUP, LLC, ALAN GUY, and RICHARD J.  
 LEIDER

UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA

In re:  
 KINGSBOROUGH ATLAS TREE  
 SURGERY, INC.,  
 Debtor.

Case No. 25-10088 WJL  
 Chapter 11  
 AP No. 25-01005

KINGSBOROUGH ATLAS TREE  
 SURGERY, INC.,

Plaintiff,

v.

ANVIL POWER, INC., a California  
 corporation, ANVIL EQUIPMENT  
 COMPANY LP, a California limited  
 partnership, ANVIL BUILDERS, a California  
 corporation, ANVIL HOLDINGS, INC., a  
 California corporation, ANVIL GROUP, LLC,  
 a California limited liability company;  
 ALAN GUY, an individual; RICHARD J.  
 LEIDER, an individual, and DOES 1-100,

Defendants.

**DECLARATION OF SEAN J. FILIPPINI  
 IN SUPPORT OF STIPULATION TO  
 EXTEND TIME FOR DEFENDANTS  
 ANVIL POWER, INC., ANVIL  
 EQUIPMENT COMPANY LP, ANVIL  
 BUILDERS, ANVIL HOLDINGS, INC.,  
 ANVIL GROUP, LLC, ALAN GUY, AND  
 RICHARD J. LEIDER TO RESPOND TO  
 PLAINTIFFS' FIRST AMENDED  
 COMPLAINT**

1 I, Sean J. Filippini, declare:

2 1. I am a Partner at the law firm Downey Brand LLP, counsel for ANVIL POWER,  
3 INC., ANVIL EQUIPMENT COMPANY LP, ANVIL BUILDERS, ANVIL HOLDINGS, INC.,  
4 ANVIL GROUP, LLC, ALAN GUY, and RICHARD J. LEIDER (collectively, "Defendants"). I  
5 have personal knowledge of the facts stated in this declaration, except those matters stated on  
6 information and belief. I believe these matters to be true, and I would testify to them if called  
7 upon to do so.

8 2. Defendants and Plaintiffs Kingsborough Atlas Tree Surgery, Inc. Richard  
9 Kingsborough, and Cindy Kingsborough (collectively, "Plaintiffs"; Plaintiffs and Defendants are  
10 together, the "Parties") have stipulated to extend the time to file a response to Plaintiffs' First  
11 Amended Complaint, such that Defendants can file such response on or before June 30, 2025.

12 3. Defendants require additional time to respond to the First Amended Complaint  
13 because it was only recently filed with the Sonoma County Superior Court on May 13, 2025, and  
14 Defendants require an opportunity to review it and, to the extent needed, confer with Plaintiffs  
15 about it.

16 4. Defendants have never received an extension of time to respond to the First  
17 Amended Complaint, whether via stipulation or Court order.

18 5. I do not believe this requested extension of time will impact the schedule for the  
19 case or proceeding.

20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct.

22 Executed this 23rd day of May, 2025, at Sacramento, California.

23  
24 /s/ Sean J. Filippini

25 SEAN J. FILIPPINI